



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
ONE CONGRESS STREET, SUITE 1100  
BOSTON, MA 02114-2023

August 1, 2006

Mr. Andrew T. Silfer  
Corporate Environmental Programs  
General Electric Company  
159 Plastics Avenue  
Pittsfield, MA 01201

Via Electronic and U.S. Mail

Re: Conditional Approval of General Electric's May 5, 2006 *Hill 78 and Building 71 On-Plant Consolidation Areas, 2006 Consolidation and Phase II Final Cover Construction*, GE-Pittsfield/Housatonic River Site, Pittsfield, Massachusetts.

Dear Mr. Silfer:

This letter contains the Environmental Protection Agency's (EPA) conditional approval of the above-referenced submittal dated May 5, 2006. This submittal is subject to the terms and conditions specified in the Consent Decree (CD) that was entered in U.S. District Court on October 27, 2000.

Pursuant to Paragraph 73 of the CD, EPA, after consultation with the Massachusetts Department of Environmental Protection (MDEP), approves the above-referenced submittal, subject to the following conditions:

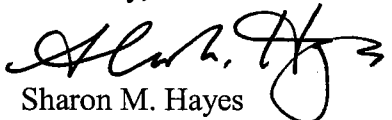
1. During final cover installation, GE shall continuously evaluate site conditions (e.g., high winds, high temperatures, humidity extremes, high air monitoring results, visible dust, etc.) and specific earthwork activities (e.g., placement of fine sands, etc.) that may result in uncontrolled vapors/visible dust and possible exceedences of particulate and PCB action levels. If necessary, GE shall propose additional operational procedures, above and beyond those described in the EPA-approved June 1999 Detailed Work Plan for On-Plant Consolidation Areas and the April 2006 Addendum to OPCA Work Plan, to ensure that final covers are installed in a controlled manner without undue delays.
2. GE shall ensure that, prior to placement of the final cover material, the 3- to 6-inch-thick layer of wood chips used for daily cover is mixed with the waste material to minimize the potential of distinct, continuous layers of wood chips remaining within the consolidation area.

3. GE shall provide daily operational procedures and sequencing including placement of daily cover over the area of the cap under construction for all layers (for example, will GE uncover, grade, and recover one-acre sized areas, or less, on a daily basis, and if so, with what material?).
4. GE shall define "Low Permeability General Fill" in Detail 1 of Drawing 8.
5. GE shall identify where Detail 2 of Drawing 8 is used.
6. GE shall identify the length of the 2H:1V slope in Detail 1 of Drawing 9 and clarify whether veneer stability during construction was considered. GE shall assess the feasibility of placing cover soil in a generally upslope direction (from the toe to the top of the slope) given the limited access to the toe of the sideslopes. In order to minimize tension, cover soil shall not be pushed from the top of the sideslopes down to the toe over geosynthetic materials.
7. GE shall submit the design calculations for the retaining wall identified in Detail 2 of Drawing 9.

GE shall submit an addendum in response to these conditions within 60 days of the date of this letter. EPA reserves its right to perform additional sampling and/or require additional sampling or Response Actions, if necessary, to meet the requirements of the CD.

If you have any questions, please contact me at (617) 918-1328.

Sincerely,



Sharon M. Hayes  
GE Facility Project Manager

cc:

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